

Hearing Date: October 21, 2010
Hearing Time: 10:00 a.m.
Objection Deadline: October 14, 2010

BAKER & HOSTETLER LLP

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SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L.
Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (BRL)

SIPA Liquidation
(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**NOTICE OF MOTION FOR AN ORDER PURSUANT TO SECTION 78fff(a)
OF THE SECURITIES INVESTOR PROTECTION ACT AND SECTIONS 363 AND
105(a) OF THE BANKRUPTCY CODE AUTHORIZING THE SALE OF CERTAIN
FINANCIAL ASSETS**

PLEASE TAKE NOTICE that, pursuant to Sections 363 and 105(a) of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.* and section 78fff(a) of the Securities Protection Investor Act, 15 U.S.C. §§ 78aaa, *et seq.*, Irving H. Picard, trustee (the “Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and Bernard L. Madoff, through his undersigned counsel, will move this Court (the “Motion”) at the United States Bankruptcy Courthouse at One Bowling Green, New York, New York, on **October 21, 2010 at 10:00 a.m.**, for an Order authorizing the Trustee to enter into agreements to sell certain financial assets held by BLMIS.

PLEASE TAKE FURTHER NOTICE that written objections to the Motion must be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 by no later than **4:00 p.m. on October 14, 2010** (with a courtesy copy delivered to the Chambers of the Honorable Burton R. Lifland) and must be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Marc Hirschfield, Esq. and (b) the Securities Investor Protection Corporation, 805 Fifteenth Street, NW, Suite 800, Washington, DC 20005, Attn: Kevin H. Bell, Esq.

Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motion.

Dated: New York, New York
September 30, 2010

By: /s/ Marc E. Hirschfield
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